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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re:

PIERCE CONTRACTORS, INC

Debtor

Case No.: 21-50915-SLJ

**NOTICE OF OPPORTUNITY FOR
HEARING ON MOTION TO VALUE
COLLATERAL OF RICHARD JOYCE
AND YONG CHA JOYCE FOR THE
PURPOSE OF STRIPPING LIEN ON 194
LANTZ DR., MORGAN HILL, CA**

CHAPTER 11
(Subchapter V)

Date: None Set
Time: None Set
Court: 9

TO: Richard W. Joyce and Yong Cha Joyce, William Healy, their attorney, the U.S.
Trustee and all Parties in Interest.

Please take notice that Debtor Pierce Contractors, Inc. will and hereby does move the Court to
value the collateral of Richard W. Joyce and Yong Cha Joyce consisting of real property commonly
known as at 194 Lantz Dr., Morgan Hill, CA [hereinafter "Property"] for the purpose of stripping its
lien on the basis that the lien is totally under-secured.

Notice of Opportunity for Hearing on Motion to Value Collateral of Richard Joyce and Yong Cha
Joyce for the Purpose of Stripping Lien on 194 Lantz Dr. Morgan Hill, CA

1 This motion is based on this Notice of Opportunity for Hearing on Motion to Value Collateral
2 of Richard Joyce and Yong Cha Joyce for the Purpose of Stripping Lien on 194 Lantz Dr., Morgan
3 Hill, CA, the Motion to Value Collateral of Richard W. Joyce and Yong Cha Joyce for the purpose of
4 Stripping Lien on 194 Lantz Dr., Morgan Hill, CA, the Memorandum of Points and Authorities in
5 support thereof and on the Declaration filed in support of the motion, on the papers, records, and other
6 documents on file herein, and on such oral and documentary evidence as may be presented at the
7 hearing of this motion.
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9 This motion is brought pursuant to B.L.R. 9014-1(b)(3), Bankruptcy Rule 3012, and notice is
10 pursuant to FRBP 7004(b).

11 (i) That Bankruptcy Local Rule 9014-1 of the United States Bankruptcy Court for the Northern
12 District of California prescribes the procedures to be followed and that any objection to the requested
13 relief, or a request for hearing on the matter, must be filed and served upon the initiating party within
14 21 days of mailing of the notice;
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16 (ii) That a request for hearing or objection must be accompanied by any declarations or
17 memoranda of law the party objecting or requesting wishes to present in support of its position;

18 (iii) That if there is not a timely objection to the requested relief or a request for hearing, the
19 Court may enter an order granting the relief by default; and
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21 (iv) That the initiating party will give at least 7 days written notice of hearing to the objecting
22 or requesting party, and to any trustee or committee appointed in the case, in the event an objection or
23 request for hearing is timely made; or the tentative hearing date.

24 If you oppose the motion, you may file a written opposition and must request a hearing and
25 serve a copy thereof on the following parties and entities:

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28 Notice of Opportunity for Hearing on Motion to Value Collateral of Richard Joyce and Yong Cha
Joyce for the Purpose of Stripping Lien on 194 Lantz Dr. Morgan Hill, CA

1 THE BANKRUPTCY COURT: UNITED STATES BANKRUPTCY COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 280 South First Street, 3rd Floor
4 San Jose, CA 95113

5 DEBTOR'S COUNSEL: LARS T. FULLER, ESQ.
6 THE FULLER LAW FIRM, P.C.
7 60 N. Keeble Avenue
8 San Jose, CA 95126

9 DEBTOR: PIERCE CONTRACTORS, INC
10 194 Lantz Dr,
11 Morgan Hill, CA 95037

12 Respectfully Submitted,

13 Dated: July 9, 2021

14 THE FULLER LAW FIRM, P.C.

15 By: Lars T. Fuller
16 LARS T. FULLER
17 Attorney for Debtor
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